

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
THOMAS M. MOROUGHAN,

12-CV-0512

Plaintiff,

-against-

JUDICIAL SUBPOENA
DUCES TECUM

THE COUNTY OF SUFFOLK,
SUFFOLK COUNTY POLICE DEPARTMENT,
SUFFOLK DETECTIVES RONALD TAVARES, CHARLES
LESER, EUGENE GEISSINGER, NICHOLAS FAVATTA,
AND ALFRED CICCOTTO, DETECTIVE/SGT. WILLIAM J. LAMB,
SGT. JACK SMITHERS, SUFFOLK POLICE OFFICERS WILLIAM MEANEY,
ENID NIEVES, CHANNON ROCCHIO, AND JESUS FAYA AND
SUFFOLK JOHN DOES 1-10, THE COUNTY OF NASSAU,
NASSAU COUNTY POLICE DEPARTMENT,
SGT. TIMOTHY MARINACI, DEPUTY CHIEF OF PATROL JOHN HUNTER,
INSPECTOR EDMUND HORACE, COMMANDING OFFICER DANIEL FLANAGAN,
DETECTIVE/SGT. JOHN DEMARTINIS, NASSAU POLICE OFFICERS
ANTHONY D. DILEONARDO, EDWARD BIENZ AND JOHN DOES 11-20

Defendants.
-----X

TO: ADA Karla Lato
Suffolk County District Attorney - Appeals Bureau
200 Center Drive
Riverhead, New York 11901

GREETINGS:

WE COMMAND YOU, that all business and excuses being laid aside, that you deliver to the office of the attorney representing the defendant, The Law Office of Anthony M. Grandinette located at 114 Old Country Road, Suite 420, Mineola, New York 11501, on May 24, 2013 at 9:00 a.m. the following records and information:

All documents from District Attorney files related to the criminal arrest of Thomas M. Moroughan on February 27, 2011 not previously disclosed (See Exhibit A) including all documents, including notes, memorandum, records, etc., including a physical copy of all grand jury subpoenas themselves (excluding the documents returned thereto to which you assert a privilege). Any documents which exist and are not produced should be identified on a separate privilege log which should be produced with the subpoenaed materials.

Failure to comply with this subpoena is punishable as a contempt of Court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed fifty dollars and all damages sustained by reason of your failure to comply.

WITNESS, Honorable A. Kathleen Tomlinson, a Magistrate Judge presiding in the United States District Court for the Eastern District of New York, this 8th day of May, 2013.

SO ORDERED:


Magistrate A. Kathleen Tomlinson